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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

SAIGUT S.A. de C.V., a Mexican corporation; and SAIPEM S.A., a French corporation,

Plaintiffs,

v.

SEMPRA ENERGY, a California corporation; SEMPRA LNG, a Delaware corporation; ENERGIA COSTA AZUL, S. de R.L. de C.V., a Mexican corporation; BVT LNG COSTA AZUL, S. de R.L. de C.V., a Mexican corporation; COSTA AZUL BMVT, S.A. de C.V., a Mexican corporation; BLACK & VEATCH CORPORATION , a Delaware corporation; TECHINT S.A. de C.V., a Mexican corporation; THE KLEINFELDER GROUP, INC., a California corporation; ARUP NORTH AMERICA LIMITED, a United Kingdom corporation; ARUP TEXAS, INC., a Texas corporation; WHESSOE OIL & GAS LIMITED, a United Kingdom corporation; Q & S ENGINEERING, INC., a California corporation; and DOES 1 through 20, inclusive

Defendants.

No. 08 CV 0478 JM BLM

MOTION TO EXTEND THE TIME FOR DEFENDANT BLACK & VEATCH CORP. TO RESPOND TO THE COMPLAINT

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Defendant Black & Veatch Corporation ("Black & Veatch") hereby submits this Motion to Extend the Time in Which Black & Veatch must respond to the complaint by 29 days, to May 8, 2008. This Motion is based on the following facts:

- On March 14, 2008, Plaintiffs filed a 50 page complaint, comprising 155 paragraphs of allegations and 12 causes of action, and naming, in addition to Black & Veatch, 11 defendants from three different countries.
- Black & Veatch's response is currently due April 9, 2008.
- Good cause exists for an extension of time because Black & Veatch needs time to investigate adequately the claims alleged, as well as all potential defenses and/or counterclaims to those claims.
- Black & Veatch has not sought or received any other extensions of time.
- On April 2, 2008, the Court entered an order granting defendants Sempra Energy and Sempra LNG (collectively here, "Sempra") an extension of time up to May 8, 2008 to respond to the complaint. By having Black & Veatch's response due the same day as Sempra's response, any motion practice that may be filed can be coordinated for hearing on a single day.
- Plaintiffs do not oppose and have agreed to Black & Veatch's request that they receive an extension to and including May 8, 2008 to answer or otherwise respond to the complaint.

NOW THEREFORE, Black & Veatch respectfully requests that the Court approve and enter an order stating that Defendant Black & Veatch is granted an additional 29 days within which to respond to the Complaint, making Black & Veatch's response due on May 8, 2008.

WHEREFORE, Black & Veatch respectfully requests that the Court approve this Motion and issue the proposed order which has been sent electronically to the Court's chambers.

DATED: April 3, 2008

WULFSBERG REESE COLVIG & FIRSTMAN
PROFESSIONAL CORPORATION

By /s/ Mark A. Stump
MARK A. STUMP
Attorneys For Defendant
BLACK & VEATCH CORPORATION